## UNITED STATES DISTRICT COURT DISTRICT OF MAINE

DANIELLE KITCHIN and DANA B. KITCHIN, Co-Personal Representatives and heirs of the ESTATE OF DANA A. KITCHIN,

Docket No. 1:18-cv-00356-JDL

Plaintiffs,

V.

RANDALL LIBERTY, et al.

#### STIPULATION OF DISMISSAL WITH PREJUDICE PURSUANT TO 41(a)(1)(A)(ii)

NOW COME PLAINTIFFS and the below DEFENDANTS in the above-captioned litigation and Stipulate to the Dismissal of all claims with prejudice, and without costs, interest or attorney's fees, against the following Defendants:

- 1. RANDALL LIBERTY,
- 2. KEN MASON,
- 3. KENNEBEC COUNTY,
- 4. KENNEBEC COUNTY SHERIFF'S OFFICE,
- 5. KENNEBEC COUNTY CORRECTIONS DIVISION,
- 6. KENNEBEC COUNTY CORRECTIONAL FACILITY,
- 7. KENNEBEC COUNTY COMMISSIONERS being PATSY G. CROCKETT, NANCY G. RINES and GEORGE M. JABAR, II,
  - 8. BRANDON GARDNER,
  - 9. NATHAN LETOURNEAU,
  - 10. BRYAN ROBBINS,
  - 11. AMANDA L. PAINE (f/k/a AMANDA CARLOW),
  - 12. MYRA GAGNON,
  - 13. AARON BEALE,
  - 14. NICHOLAS ROUTHIER,
  - 15. ALEX MORIN,
  - 16. DARRELL BRYANT,
  - 17 KEITH LACHANCE,
  - 18. MARSHA ALEXANDER and
  - 19. JOHN AND JANE DOES 1 THROUGH 100.

### Dated this 11th day of March 2020 in Portland, Maine.

Respectfully Submitted,

/s/ Timothy E. Zerillo, Esq. ME Bar No. 9108 Attorney for Plaintiffs Zerillo Law Firm, LLC 1250 Forest Ave, Ste 3A Portland, ME 04103

/s/ Peter T. Marchesi Peter T. Marchesi, Esq. Wheeler & Isy, P.A. 27 Temple Street Waterville, ME 04901

/s/ John J. Wall III MONAGHAN LEAHY, LLP 95 Exchange Street, P.O. Box 7046 Portland, ME 04112-7046 Respectfully Submitted,

/s/ John M. Burke, Esq. ME Bar No. 4787 Attorney for Plaintiffs Caseiro Burke LLC One Union Street, Suite 400 Portland, ME 04101

/s/ Cassandra S. Shaffer Cassandra S. Shaffer, Esq. Wheeler & Isy, P.A. 27 Temple Street Waterville, ME 04901

/s/ Jeffrey T. Edwards Preti Flaherty, LLP One City Center, P.O. Box 9546 Portland, Maine 04112-9546

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### **CERTIFICATE OF SERVICE**

I hereby filed foregoing the Stipulation of Dismissal on all parties via the ECF system.

Respectfully Submitted,

/s/ Timothy E. Zerillo, Esq. ME Bar No. 9108
Attorney for Plaintiffs
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